

PARK JENSEN BENNETT LLP

40 WALL STREET

NEW YORK, NEW YORK 10005

(646) 200 - 6300

WWW.PARKJENSEN.COM

TAI H. PARK

TPARK@PARKJENSEN.COM

DIRECT DIAL (646) 200-6310

TELECOPIER (646) 200-6311

September 20, 2016

ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Ng Lap Seng and Jeff C. Yin,
S4 15 Cr. 706 (VSB)

Dear Judge Broderick:

On behalf of Defendant Ng Lap Seng, we write to seek leave to seal our supplemental letter dated September 20, 2016 (“Confidential Letter”) to clarify an argument in the Reply Memorandum of Law In Support of Mr. Ng’s Motion to Compel discovery of the Internal Government Documents (“Reply Brief”). In its Order (Docket No. 287) earlier today, the Court granted us leave to file Exhibit A of our Reply Brief, a confidential FISA intercept that the government produced to the defense, under seal. Since the Confidential Letter describes Exhibit A in detail, we believe it too should be filed under seal.

Very truly yours,



Tai H. Park

cc: All counsel of record